

EXHIBIT 1

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ROSSANA BAEZA
IN SUPPORT OF PLAINTIFFS' REPLY
IN SUPPORT OF THEIR RENEWED
REQUEST TO DEPOSE GOOGLE CEO
SUNDAR PICHAI**

The Honorable Susan van Keulen

DECLARATION OF ROSSANA BAEZA

I, Rossana Baeza, declare as follows.

1. I am an associate with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida and admitted *pro hac vice* in this case (Dkt. 11). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Attached as **Exhibit EE** is a true and correct copy of excerpts of the June 30, 2022 deposition of Sabine Borsay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of August, 2022, in Nashville, Tennessee.

/s/ Rossana Baeza

Rossana Baeza